1	BAYRAMOGLU OFFICES LLC	020)		
2	NIHAT DENIZ BAYRAMOGLU (NV BAR: 140 deniz@bayramoglu-legal.com	J30)		
2	GOKALP BAYRAMOGLU (Nevada Bar 15500	)		
3	gokalp@bayramoglu-legal.com	,		
,	1540 West Warm Springs Road Suite 100			
4	Henderson Nevada 89014			
5	Telephone: 702.462.5973 Facsimile: 702.553.3404			
	Attorneys for Non-Parties			
	Thermeys for two 1 arries			
7	BAILEY KENNEDY			
8	Joshua M. Dickey			
	Nevada Bar No. 6621			
9	8984 Spanish Ridge Avenue			
10	Las Vegas, Nevada 89148-1302 Telephone: 702.562.8820			
	Facsimile: 702.562.8821			
11	JDickey@BaileyKennedy.com			
12	TECHMADIZ			
	TECHMARK   Neil D. Greenstein			
13	Virginia Bar No. 18555			
14	(ADMITTED PRO HAC VICE) 1934 Old Gallows Road, 3rd Floor Vienna, Virginia 22182			
4.5				
15				
16	Telephone: 347.514.7717			
47	Facsimile: 408.280.2250 and and analysis of the second sec			
17	Attorneys for Plaintiff Wheel Pros, LLC			
18				
19	IN THE UNITED STATES DISTRICT COURT			
19	DISTRICT OF NEVADA			
20				
21	WHEEL PROS, LLC,	Case Number		
21	Plaintiff,	2:23-cv-00650-GMN-VCF		
22	VS.			
23		ORDER TO CONTINUE THE		
	RHINO TIRE USA, LLC, et al.,	EVIDENTIARY HEARING ON PLAINTIFF'S MOTION TO COMPEL		
24	D. f. v. lauta	RESPONSES TO SUBPOENAS		
25	Defendants.	· · · · ·		
		(FIRST REQUEST)		
26				

	ш	
2		I
3		C
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
	П	

25

26

1

Plaintiff Wheel Pros, LLC ("Plaintiff") and Non-Parties Nazly Aileen Bayramoglu and Bayramoglu Law Offices LLC ("Non-Parties" or "BLO"), by and through their respective counsel of record, hereby stipulate and agree as follows:

- 1. On April 25, 2023 Plaintiff filed a Motion to Compel Responses to Subpoenas Issued to Nazly Aileen Bayramoglu and Bayramoglu Law Offices LLC (ECF No. 1).
- 2. On May 9, 2023 Non-Parties filed their Opposition to Plaintiff's Motion to Compel Responses to [Rule 45] Subpoenas (ECF No. 7).
- 3. On May 16, 2023 Plaintiff filed a Reply in Support of Motion to Compel Responses to Subpoenas (ECF No. 9).
- On May 31, 2023 the Honorable Cam Ferenbach ordered an evidentiary hearing on the motion to compel responses to subpoenas for June 23, 2023 at 10:00 AM in Courtroom 3D (ECF No. 11).
- 5. The parties are actively engaged and close to reaching an agreement that renders Plaintiff's Motion as moot.
- 6. Accordingly, the parties stipulate to continue the hearing to three weeks to July 14, 2023 or as soon thereafter as the Court's schedule permits.
- 7. This is the first stipulation to continue the evidentiary hearing and is made in good faith and not in an attempt to delay proceedings.

Respectfully submitted this 19th day of June, 2023.

## **BAILEY KENNEDY**

## By: /s/ Joshua M. Dickey Joshua M. Dickey Nevada Bar No. 6621 8984 Spanish Ridge Avenue Las Vegas, Nevada 89148-1302

Telephone: 702.562.8820 Facsimile: 702.562.8821

JDickey@BaileyKennedy.com

## **Bayramoglu Law Offices LLC**

By: /s/ Nihat Deniz Bayramoglu
Nihat Deniz Bayramoglu
Nevada Bar No. 14030
1540 West Warm Springs Road Ste. 100
Henderson, NV 89014
Tel: (702) 462-5973
deniz@bayramoglu-legal.com
Attorneys for Non-Parties

1	TECHMARK		
2	Neil D. Greenstein		
3	Virginia Bar No. 18555 (ADMITTED PRO HAC VICE)		
4	1934 Old Gallows Road, 3rd Floor Vienna, Virginia 22182		
5	Telephone: 347.514.7717 Facsimile: 408.280.2250		
6	ndg@techmark.com		
7	Attorneys for Plaintiff Wheel Pros, LLC		
8			
9	ORDER		
10	Having considered the parties Stipulation and good cause appearing,		
11	IT IS ORDERED that the hearing scheduled for June 23, 2023 at 10:00 AM is		
12	hereby continued to July 14, 2023 at 10:00 am in LV Courtroom 3B.		
13	IT IS SO ORDERED.		
14	Continue		
15	UNITED STATES MAGISTRATE JUDGE		
16	DATED: June 20, 2023		
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			